

August 25, 1999

Dockets Management Branch (HFA-305)  
Food & Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

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Dear FDA:

I'm writing in response to your request for comments on how to reduce the threat to consumer health posed by egg-borne diseases (reference Docket Numbers 98N-1230, 96P-0418, and 97P-0197). Banning the forced molting of laying hens--a cruel routine practiced by agribusiness to increase egg-laying efficiency and manipulate egg supply that involves starving the birds for days--would reduce the probability of salmonella contamination of hens and their eggs.

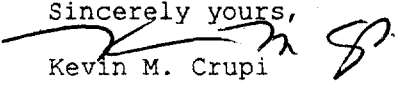
In nature usually around the beginning of winter, birds replace their feathers with new ones. During this process of molting, hens stop laying eggs for up to four months at a time and concentrate their energies on growing new feathers. The egg industry artificially changes this natural process of molting to ensure all hens molt simultaneously in order to optimize and manipulate egg supply, reduce the amount of time the hens are not laying eggs, and ensure higher shell quality in a calcium-deficient diet. Donald Bell, the "founder" of forced molting, urges complete food removal for no less than five days. By combining the fast with water removal, drugs, and artificial light manipulation, the industry forces the hens to change their natural cycle, abruptly shed their feathers, and stop laying eggs for only one or two months instead of the natural three or four.

Researchers have found that forced molting ruins the birds' immune systems and increases the risk of salmonella infection in the laying hens and their eggs. Salmonella is a bacterium that causes serious illness in humans. The Centers for Disease Control list salmonella as one of the "top ten mostly deadly infectious diseases." The USDA's Food Safety & Inspection Service (FSIS) has stated: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis (Se) by laying hens subjected to these practices."

At any given time, over 6 million hens in the U.S. suffer forced molting. Considering the battery hen must also endure confinement crammed into small cages, unsanitary conditions in close proximity to the waste of other birds in the sheds, and painful debeaking, the life of egg-laying hens is truly miserable. These horrific conditions increase the likelihood the birds and people who consume their eggs will be infected with dangerous salmonella.

Just regulating egg refrigeration temperatures and requiring producers to put bacteria warning labels on egg cartons hasn't prevented increased incidence of egg-borne diseases. Had the FDA acted on the petition filed by the non-profit group United Poultry Concerns in April 1998 to ban forced molting (Docket #98P-0203/CP), a great number of egg-related illnesses could have been avoided. Since the FDA has the jurisdiction to ban farm practices, I urge the FDA to protect human health and ignore political pressure from big agribusiness by outlawing the cruel practice of forced molting. Thank you.

Sincerely yours,

  
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96P-0418

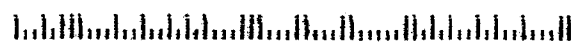
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CROSS FILE SHEET

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File Number: 98N-1230/ *C 425*

See File Number: 97P-0197/ *C 426*

96P-0418/ *C 425*